## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA

LIBERTY MUTUAL FIRE	)	
INSURANCE COMPANY,	)	
Plaintiff,	)	
	)	CIVIL ACTION FILE
V.	)	NO. 1:07-CV-1516
	)	
APAC-SOUTHEAST, INC., f/k/a	)	
APAC-GEORGIA, INC.,	)	
Defendant,	)	

## DEFENDANT APAC-SOUTHEAST, INC.'S NOTICE OF STATUS OF DISCOVERY DISPUTES

COMES NOW Defendant APAC-Southeast, Inc. ("APAC"), by and through undersigned counsel, and pursuant to this Court's November 28, 2007 Order, hereby notifies the Court that APAC and the Insurance Company of the State of Pennsylvania ("ICSP") have resolved their discovery dispute concerning ICSP's Motion to Quash. Regrettably, APAC and Liberty Mutual Fire Insurance Company ("Liberty Mutual") have been unable to resolve their discovery dispute. Liberty Mutual has indicated an intention to oppose APAC's Motion to Compel Discovery, and APAC therefore requests that this Court address the matters raised in APAC's Motion to Compel Discovery from Plaintiff Liberty Mutual.

Respectfully submitted this 5<sup>th</sup> day of December, 2007.

Hall & Hoffman, LLP

/s/ M. Craig Hall
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## CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

James Chin, Esquire Robins, Kaplan, Miller & Cirisi, L.L.P. 2600 One Atlanta Plaza 950 East Paces Ferry Road, N.E. Atlanta, GA 30326

This 5<sup>th</sup> day of December 2007.

/s/ M. Craig Hall
M. Craig Hall
GBN: 319220
Counsel for Defendant

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## **LOCAL RULE 7.1(D) CERTIFICATION**

Pursuant to Local Rule 7.1(D), I hereby certify that this brief has been prepared with Times New Roman, 14 point.

/s/ M. Craig Hall M. Craig Hall